

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**UNITED STATES OF AMERICA**

v.

\*

**Criminal No. ELH-20-0034**

**CHARVEZ BROOKS**

\*

**Defendant.**

\*

\* \* \* \* \*

**CONSENT MOTION FOR EXTENSION OF TIME TO RESPOND  
TO DEFENDANT'S PRETRIAL MOTIONS**

The United States of America respectfully requests an additional 7 days to respond to the Defendant's Pretrial Motions. Counsel for the Defendant has indicated that he consents to the relief requested in this motion.

1. On October 6, 2023, the Court set a schedule for the filing of pretrial motions and for trial in this case. ECF No. 49. Pursuant to the schedule, defense motions were due on December 8, 2023. Id. The Defendant, through counsel, filed four pretrial motions on December 8, 2023. ECF Nos. 50, 51, 52, 53.

2. The government's opposition deadline was originally set for January 8, 2024, ECF No. 49, but the Court granted the government's request to extend the deadline to January 19, 2024, ECF Nos. 66, 67.

3. The government respectfully requests an additional 7 days to complete its responses. Undersigned counsel and his wife are expecting the birth of their second child. The due date was January 25, 2024, but after a recent doctor's appointment, doctors determined that an induction should be scheduled for January 16, 2024. As a result, undersigned counsel expects to be unavailable for the next several days and, therefore, respectfully requests an additional 7-day extension of time to complete the government's response briefs.

4. Undersigned counsel has contacted counsel for the Defendant, who has indicated that he consents to the requested extension.

5. A proposed Order is attached for the Court's convenience.

**WHEREFORE**, the United States respectfully requests the Court grant this Motion and extend the deadline for the government to file its responses to the Defendant's pretrial motions to January 26, 2024.

Respectfully submitted,

Erek L. Barron  
United States Attorney

By: /s/ Anatoly Smolkin  
Anatoly Smolkin  
Ari D. Evans  
Assistant United States Attorneys

Dated: January 16, 2024